

EXHIBIT LL

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
3 CHARLESTON DIVISION

4 - - -
IN RE: ETHICON, INC. : MDL NO. 2327
5 PELVIC REPAIR SYSTEM, :
PRODUCTS LIABILITY :
6 LITIGATION :

7 THIS DOCUMENT RELATES TO ALL CASES

8 - - -
9 AND VARIOUS OTHER CROSS-NOTICED ACTIONS

10 - - -
11 August 7, 2013

12 - - -
CONFIDENTIAL - SUBJECT TO PROTECTIVE ORDER

13
14 Videotaped deposition of MARK C. YALE
taken pursuant to notice, was held at the law
15 offices of Riker Danzig Scherer Hyland & Perretti
LLP, Headquarters Plaza, One Speedwell Avenue,
16 Morristown, New Jersey, beginning at 9:35 a.m., on
the above date, before Ann Marie Mitchell, a
17 Federally Approved Certified Realtime Reporter,
Registered Diplomat Reporter and Notary Public for
18 the State of New Jersey.

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22
23 GOLKOW TECHNOLOGIES, INC.

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24 deps@golkow.com
25

1 document dump.

2 Q. Did you ever recall that Medscand did
3 that, a document dump?

4 A. I became aware of that later, yes.

5 Q. Do you know where those are?

6 A. No.

7 Q. Nobody had asked you in your time
8 managing the litigation issues and documents, where
9 are those Medscand documents?

10 A. I remember someone looking for them,
11 but I don't ever remember an outcome.

12 Q. You don't remember anybody finding
13 them?

14 A. I don't remember anybody finding
15 them.

16 Q. It's a bunch of pallets of documents.
17 Somebody described it as 500 pounds of documents.

18 MR. HUTCHINSON: Object to form.

19 THE WITNESS: I do not know where
20 they were.

21 BY MR. ZONIES:

22 Q. Can you look into that for me?

23 A. Not anymore.

24 Q. When you were doing your quality
25 engineering and TVT-S and laser-cut mesh was going